

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SENTIUS INTERNATIONAL, LLC,

Plaintiff,

v.

BLACKBERRY LIMITED and
BLACKBERRY CORPORATION,

Defendants.

CASE NO. 2:16-CV-773-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF ROBERT J. YORIO IN SUPPORT
OF PLAINTIFF'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Robert J. Yorio, declare:

1. I am one of the attorneys of record for Plaintiff, Sentius International, LLC ("Sentius") in this action. I have prepared this declaration in support of Plaintiff, Sentius International, LLC's (SENTIUS) Opening Claim Construction Brief. The following facts and documents set out herein are within my knowledge, and if called as a witness to testify herein, I could and would competently testify to the truth thereto.

2. Exhibit 1 is a true and correct copy of the Asserted Patents and Claims.

3. Exhibit 2 is a true and correct copy of the U.S. Reissued Patent RE 40,731E dated June 9, 2009.

4. Exhibit 3 is a true and correct copy of the U.S. Reissued Patent RE 43,633E dated September 4, 2012.

5. Exhibit 4 is a true and correct copy of the Order Re: Construction of Claim 8 of U.S. Patent No. 5,822,720 (Dkt. 52-7; filed 3.29.02), *Sentius Corporation v. Flyswat, Inc.* (NDCA Case No. C00-02233 SBA) .

6. Exhibit 5 is a true and correct copy of the Claim Construction Order (Dkt. 66; filed 1.9.14), *Sentius International, LLC v. Microsoft Corporation* (NDCA Case No. 5:13-cv-00825-PSG).

7. Exhibit 6 is a true and correct copy of the Declaration of Dr. Vijay K. Madiseti dated April 20, 2017.

8. Exhibit 7 is a true and correct copy of the Curriculum Vitae of Dr. Vijay K. Madiseti, ECE.

9. Exhibit 8 is a true and correct copy of selected pages from the Motion for Summary Judgment of No Infringement (Direct, Indirect, or Willful); pp. 3-4 (Dkt. 129; filed 12.2.14), *Sentius International LLC v. Microsoft Corporation* (NDCA Case No. 5:13-cv-00825-PSG).

10. Exhibit 9 is a true and correct copy of an excerpt from the Microsoft Press, *Computer Dictionary: The Comprehensive Standard for Business, School, Library, and Home*, pp. 216-17 (1991).

11. Exhibit 10 is a true and correct copy of excerpts from *The Computer Glossary: The Complete Illustrated Dictionary*, Alan Freedman (7th ed. 1995), pps. 224, 268, 276.

12. Exhibit 11 is a true and correct copy of an excerpt from the IEEE Standard Dictionary of Electrical and Electronics Terms (1996) (defining “link” as “a pointer.”).

13. Exhibit 12 is a true and correct copy of an excerpt from the *High Tech Dictionary*, Computer User (“link”).

14. Exhibit 13 is a true and correct copy of the excerpts from the Random House Personal Computer Dictionary, Philip E. Margolis (2nd ed. 1996), p. 346, (*offset*).

15. Exhibit 14 is a true and correct copy of excerpts from the publication entitled, "Document Image Understanding: Geometric and Logical Layout", pps. 386, 387, 389, Robert M. Haralick, Electrical Engineering FT-10 University of Washington, Seattle, WA 98115 - 1994 IEEE.

16. Exhibit 15 is a true and correct copy of excerpts from the publication entitled, "A Structure Editor for Abstract Document Objects", Gary D. Kimura, pps. 418, 422, 430-435 (1986) Member, IEEE, IEEE Transactions on Software Engineering, Vol. SE-12, No. 3, March 1986 - 1986 IEEE.

17. Exhibit 16 is a true and correct copy of excerpts from the publication entitled, "Document Formatting Systems: Survey, Concepts, and Issues", Richard Furuta, Jeffrey Scofield, and Alan Shaw, pps. 419, 420, 432, 447-449 (1982), Department of Computer Science, University of Washington, Seattle, Washington, 89195, Computing Surveys, Vol. 14, No. 3, September 1982.

18. Exhibit 17 is a true and correct copy of excerpts from the publication entitled, "Ten Years of Window Systems - A Retrospective View", p. 36, Warren Teitelman, F. R. A. Hopgood et al. (eds.), Methodology of Window Management - EUROGRAPHICS The European Association for Computer Graphics (1986).

19. Exhibit 18 is a true and correct copy of excerpts from the publication entitled, "A Description of the Model-View-Controller User Interface Paradigm in the Smalltalk-80 System", Figures 1, 7, 16, Glenn E. Krasner and Stephen T. Pope, ParcPlace Systems, Inc., 1550 Plymouth Street Mountain View, CA 94043 - 1988 ParcPlace Systems.

20. Exhibit 19 is a true and correct copy of excerpts from the publication entitled, “TreadMill Ink – Enabling Continuous Pen Input on Small Devices”, Giovanni Seni, Motorola Human Interface Labs, 805 E. Middlefield Road, Mountain View, CA 94043, Proceedings of the Eighth International Workshop on Frontiers in Handwriting Recognition, 2002 IEEE.

21. Exhibit 20 is a true and correct copy of excerpts from the publication entitled, “The Text Editor sam”, pps. 6-8, 12, 14, 18, Rob Pike - rob@plan9.bell-labs.com.

22. Exhibit 21 is a true and correct copy of the U.S. Patent No. 5,436,637 - issued July 25, 1995 entitled “Graphical User Interface System and Methods for Improved User Feedback”.

Inventors: Charles E. Gayraud; Perry A. Gee.

23. Exhibit 22 is a true and correct copy of the U.S. Patent No. 5,581,670 - issued December 3, 1996 entitled “User Interface Having Movable Sheet with Click-Through Tools. Inventors: Eric A. Bier; William A. S. Buxton.

24. Exhibit 23 is a true and correct copy of the European Patent Publication No. 0266001A2, “A Parser for Natural Language Text”. Applicant: International Business Machines Corporation. Inventors: Antonio Zamora; Michael D. Gunther; Elena M. Zamora.

25. Exhibit 24 is a true and correct copy of the Emacs - Version 18.59 (ftp://ftp.gnu.org/old-gnu/emacs/) and VI (VIM) Version 3.0 (ftp://ftp.vim.org/pub/vim/unix).

26. Exhibit 25 is a true and correct copy of the Array Definition. Array. (n.d.) Christensson, P. (2007, October 17). Retrieved 2017, May 24, from <https://techterms.com/definition/array>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of May, 2017.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record are being served with a copy of this document on this 26th day of May 2017 as indicated:

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Dated: May 26, 2017

Respectfully Submitted,

By: /s/ ss

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